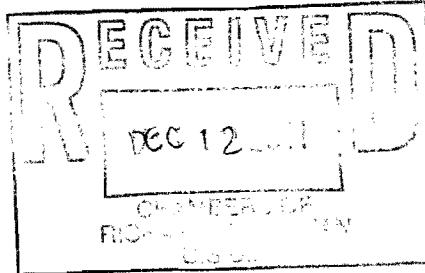


Duane Morris

ANTHONY J. COSTANTINI
 DIRECT DIAL: 212.692.1032
 PERSONAL FAX: 212.692.1020
 E-FAX: 212.202.4715
 E-MAIL: ajcostantini@duanemorris.com

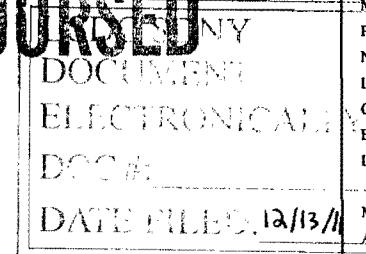
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December 9, 2011



MEMO ENDORSED

19.2



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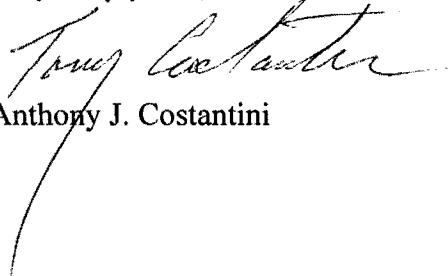
Re: Stanley Madaloni v. Mada Design, Inc.
Civil Action No. 11 CIV 5086 (RMB)/(DCF)

Your Honor:

We are counsel to Stanley Madaloni, the plaintiff in this transaction. This week, counsel for the defendant Mada Design, Inc. wrote Magistrate Judge Debra Freeman that it was contemplating dissolution or bankruptcy.

In light of this development, we are concerned about the collectability of our claim against Mada Design, Inc., which revolves around an Employment Agreement between our client and Mada Design. The Employment Agreement defines Mada Design to include its affiliates, a term that most certainly includes Iverco Inc., which we understand to be the sole shareholder of Mada Design. In light of Mada Design's apparent recent misfortune, we would ask this Court to allow us to re-amend the Complaint to include Iverco as a defendant. Since Iverco is bound by the terms of the Employment Agreement, no further discovery will be necessary.

Very truly yours,


 Anthony J. Costantini

AJC/gg

DUANE MORRIS LLP

1540 BROADWAY NEW YORK, NY 10036-4086
 DM12999464.1

PHONE: 212.692.1000 FAX: 212.692.1020

Duane Morris

Honorable Richard Berman

December 9, 2011

Page 2

cc: Hon. Debra Freeman
Marc S. Wenger, Esq. (via e-mail)
David R. Ehrlich, Esq. (via e-mail)
Keith D. Greenberg, Esq.

Defendant to respond by
12/19/11.

SO ORDERED:
Date: 12/12/11

Richard M. Berman
Richard M. Berman, U.S.D.J.